

DECLARATION OF JANA RUTT

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I, Jana Rutt, hereby declare as follows:

1. I am currently employed at Starbucks Corporation (“Starbucks”) as a partner resources vice president. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, I could and would testify competently to these facts under oath.

2. In my capacity as partner resources vice president, I am familiar with and have personal knowledge of Starbucks time punch and payroll systems, retail operations, workforce distribution, scheduling practices, and general business affairs. I have access to the records maintained in these systems.

3. Starbucks store employees in California record their work time by using an electronic time-keeping system located in the stores. The system records the times that employees “punch in” or “punch out” of work. The time punch records are sometimes edited to fix mistakes, such as when a partner ended his or her shift but forgot to “punch out.” Starbucks maintains the post-edit time punch records electronically in the ordinary course of business, at or near the time the punch or edit occurs. Attached hereto as **Exhibit G** is a true and correct copy of Douglas Troester’s time punch data from August 6, 2008 to the present. This data was retrieved from the time punch system.

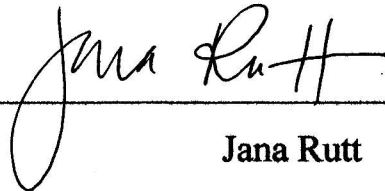
4. Starbucks maintains a telephone “helpline” which employees can call with questions, concerns, or advice regarding human resources-related matters, including consultation on management practices, requests for disability accommodation, clarification on company policies, questions or concerns about paychecks, or to report concerns about the workplace.

5. In the ordinary course of business, Starbucks maintains records of each call to the helpline, at or near the time the call occurs, including the caller’s identity (if disclosed), the caller’s questions or concerns, how the question or concern was answered or addressed, and any further actions taken by Starbucks to follow up on the

1 follow up on the initial call. Attached hereto as **Exhibit H** is a true and correct copy of
2 a call made by caller Douglas Troester to the Partner Contact Center on July 1, 2005.

3 I certify under penalty of perjury under the laws of the United States that the
4 foregoing is true and correct.

5 Executed this 20th day of December, 2013 at Winchester, CA.

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8 _____
9 Jana Rutt